REMARKS

Claims 1-22 are pending in the application. Claims 1-22 have been rejected under 35 U.S.C. §103(a) as being deemed unpatentable over Applicants' Admitted Prior Art (AAPA) in view of Kase et al. (U.S. Patent No. 6,047,340). Of the Claims, Claims 1, 7, 13 and 19 are independent. Claims have been amended to clarify the Applicants' invention. The application as amended and argued herein, is believed to overcome the rejections.

An embodiment of the Applicants' invention is directed to request conversion. If an amount of data requested to be transferred by a data transfer request according to a first protocol exceeds a maximum data transfer amount permitted to be requested by a single data transfer request according to a second protocol, one data transfer request and a data structure is generated according to the second protocol. The one data transfer request requests transfer of a portion of the data. The data structure comprises one or more values identifying, at least in part, another portion of the data. The one or more values in the data structure for providing one or more other values indicating parameters of any data transfer request according to the second protocol. Another data structure associated with the second protocol is modified based, at least in part, upon the one or more values. The another data structure comprises, prior to the modifying, at least in part, of the another data structure, one or more other values indicating, at least in part, one or more parameters of the one data transfer request. *(See,* for example, Fig. 2, data structures 206, 212.)

Turning to the cited references, Kase discusses a method for transmitting data by dividing the data into blocks and storing a list of parameters (a first address and data size) for each block of data to be transferred. The list includes parameters to be used for data transfer requests, with each data block associated with a different data transfer request and storing values for start address and data size to be used in that data transfer request. (*See* Kase, Fig. 2, step 25 (divide data into blocks), Fig 3, 13 (list) and Fig. 4.) The values for parameters that are stored in the list associated with a block are used in the associated data transfer request. (*See* Figs 10 and 11, 202 (data size), 203 (transfer command) and Col. 9, line 64 – Col. 10, line 39.)

To establish a prima facie case for obviousness under 35 U.S.C. 103(a), (1) there must be some suggestion or motivation to combine reference teachings; (2) there must be a reasonable

expectation of success; (3) the references when combined must teach or suggest all the claim limitations. For the reasons discussed below, it is respectfully submitted that the Office has not established a prima facie case under 35 U.S.C. 103(a) for claims 1-22 and that therefore, claims 1-22 are allowable.

The references when combined do not teach or suggest all the claim limitations.

Kase's discussion of a list of blocks does not teach or suggest at least:

"generating one data transfer request according to the second protocol and a data structure, the one data transfer request requesting transfer of a portion of the data, the data structure comprising one or more values identifying, at least in part, another portion of the data, the one or more values in the data structure for providing one or more other values indicating parameters of any data transfer request according to the second protocol"

as claimed by the Applicants in claim 1.

In contrast, Kase merely discusses storing all values for parameters for all data transfer requests in a list that is stored in memory. Additional memory is consumed to store values for all parameters for all of the separate data transfer requests required to transfer the data, because each data transfer request has a respective block in the list that stores values of parameters for that data transfer request. (*See* Kase, Page 2, paragraph [0004].)

In an embodiment of the Applicant's invention a data structure stores one or more values for providing one or more values indicating parameters of any data transfer request according to the second protocol. That is, the values in the data structure may be used to provide values indicating parameters of any data transfer request. Thus, memory use is reduced through re-use of the another structure associated with the second protocol by modifying the another structure using the one or more values of the data structure.

Claims 2-6 are dependent claims that depend directly or indirectly on claim 1 which has already been shown to be non-obvious over the cited art.

Independent claims 7, 13 and 19 recite a like distinction and are thus non-obvious over the cited art. Claims 8-13 depend directly or indirectly on claim 7, claims 14-18 depend directly or indirectly on claim 13 and claims 20-22 depend directly or indirectly on claim 19 and are thus non-obvious over the cited references.

Therefore, separately or in combination, AAPA and Kase do not teach or suggest the Applicants' claimed invention. Even if combined, the present invention as now claimed does not result as argued above.
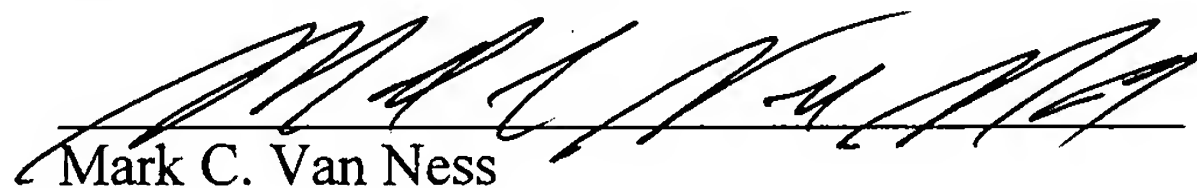
Accordingly, the present invention as now claimed is not believed to be made obvious from the cited references. Removal of the rejections under 35 U.S.C. § 103(a) and acceptance of claims 1-22 is respectfully requested.

CONCLUSION

In view of the foregoing, it is submitted that all claims (claims 1-22) are in condition of allowance. The Examiner is respectfully requested to contact the undersigned by telephone if such contact would further the examination of the above-referenced application.

Respectfully submitted,

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